

DOUGLAS F. CARLSON (CA Bar #173265)  
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Plaintiff Pro se  
and Attorney for Maya Zubkovskaya

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

DOUGLAS F. CARLSON,	)	Civil Action,
MAYA ZUBKOVSKAYA	)	File No. 25-01164
Plaintiffs	)	
	)	
v.	)	COMPLAINT FOR ORDER TO
	)	PRODUCE RECORDS
UNITED STATES DEPARTMENT OF	)	
HEALTH AND HUMAN SERVICES	)	
Defendant	)	

**PARTIES**

1. Plaintiffs are Douglas F. Carlson and Maya Zubkovskaya.

**JURISDICTION**

2. The Freedom of Information Act (FOIA) claims arise under 5 U.S.C. § 552.

This court has jurisdiction over the FOIA claims pursuant to 5 U.S.C. § 552(a)(4)(B).

3. Defendant is an agency of the United States Government subject to FOIA.

**DIVISIONAL ASSIGNMENT**

4. Venue is proper in the federal court district in which the plaintiffs reside.

5 U.S.C. § 552(a)(4)(B).

5. Plaintiffs reside in San Francisco County.

6. This case should be assigned to the San Francisco or Oakland Division.

**FIRST CLAIM FOR RELIEF (Request #1) (Both Plaintiffs)**

7. Plaintiffs submitted a FOIA request by e-mail to defendant on November 9, 2020 (Request #1). Defendant assigned tracking number 2021-00227-FOIA-OS to this request.

8. Defendant did not comply with 5 U.S.C. § 552(a)(6)(A)(i).

9. Defendant has not provided any records to plaintiffs.

10. Defendant did not respond to requests for a status update that plaintiff Carlson sent to defendant by e-mail on December 25, 2024, and January 19, 2025.

11. Defendant improperly withheld records that plaintiffs requested in Request #1.

12. Plaintiffs have exhausted their administrative remedies.

**SECOND CLAIM FOR RELIEF (Request #2) (Plaintiff Carlson)**

13. Plaintiff Carlson submitted a FOIA request by e-mail to defendant on April 11, 2023 (Request #2). Defendant assigned tracking number 2023-00089-FOPA-OS to this request.

14. Defendant did not comply with 5 U.S.C. § 552(a)(6)(A)(i).

15. Defendant has not provided any records to plaintiff Carlson.

16. Defendant did not respond to requests for a status update that plaintiff Carlson sent to defendant by e-mail on December 25, 2024, and January 19, 2025.

17. Defendant improperly withheld records that plaintiff Carlson requested in Request #2.

18. Plaintiff Carlson has exhausted his administrative remedies.

**THIRD CLAIM FOR RELIEF (Request #3) (Plaintiff Zubkovskaya)**

19. Plaintiff Zubkovskaya submitted a FOIA request by e-mail to defendant on May 4, 2023 (Request #3). Defendant assigned tracking number 2023-00099-FOPA-OS to this request.

20. Defendant did not comply with 5 U.S.C. § 552(a)(6)(A)(i).

21. Defendant has not provided any records to plaintiff Zubkovskaya.

22. Defendant did not respond to a request for a status update that plaintiff Carlson sent to defendant by e-mail on January 19, 2025.

23. Defendant improperly withheld records that plaintiff Zubkovskaya requested in Request #3.

24. Plaintiff Zubkovskaya has exhausted her administrative remedies.

**PRAYER FOR RELIEF**

25. Plaintiffs request an order from the court requiring defendant to produce and provide to plaintiffs the records that defendant improperly withheld.

26. Pursuant to 5 U.S.C. § 552(a)(4)(E), plaintiffs request reimbursement of reasonable attorney fees and other litigation costs.

Respectfully submitted,

Dated: February 4, 2025

/s/ Douglas F. Carlson  
DOUGLAS F. CARLSON  
Plaintiff Pro se  
Attorney for Plaintiff Zubkovskaya

**CERTIFICATION PURSUANT TO CIVIL L.R. 3-15**

Pursuant to Civil L.R. 3-15, the undersigned certifies that as of this date, there is no conflict or interest (other than the named parties) to report.

Dated: February 4, 2025

/s/ Douglas F. Carlson  
DOUGLAS F. CARLSON

Dated: February 4, 2025

/s/ Maya Zubkovskaya  
MAYA ZUBKOVSKAYA